

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

***In re Family Dollar Stores, Inc., Pest  
Infestation Litigation***

**This Document Relates To:**

**ALL CASES**

MDL No. 3032

Case No. 2:22-md-03032-SHL-TMP

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF  
CONSOLIDATED CLASS ACTION SETTLEMENT**

Plaintiffs Sheena Bibbs, Tina Bishop, Beverly Gordon, Julian Graves, Martha Lacy, Taylor Lorimer, Soyna Mull, Vinnie Smith, Sandra Walker, and Jerome Whitney on behalf of themselves and all others similarly situated (“Plaintiffs”), by and through the Co-Lead Class Counsel, hereby move for an order pursuant to Fed. R. Civ. P. 23:

1. Granting preliminary approval of a settlement between Plaintiffs and Defendants Family Dollar Stores of Tennessee, LLC; Family Dollar Stores of Arkansas, LLC; Family Dollar Stores of Alabama, LLC; Family Dollar Stores of Louisiana, LLC; Family Dollar Stores of Mississippi, LLC; Family Dollar Stores of Missouri, LLC; Family Dollar Services, LLC; Family Dollar, LLC (formerly Family Dollar, Inc.); and Family Dollar Stores, LLC (formerly Family Dollar Stores, Inc.); (“Defendants”), and finding that the settlement encompassed by the Settlement Agreement (attached as Exhibit 1 to the Memorandum of Law in Support of Plaintiffs’ Unopposed Motion for Preliminary Approval Of Consolidated Class Action Settlement) is preliminarily determined to be fair, reasonable, adequate, and in the best interests of the Settlement Classes, raises no obvious reasons to doubt its fairness, and raises a reasonable basis for presuming that the Settlement and its terms satisfy the requirements of Fed. R. Civ. P. 23(c)(2) and 23(e).

2. Finding that the Court will likely find that the requirements of Federal Rules of Civil Procedure 23(a) and 23(b)(3) will be satisfied for settlement and judgment purposes only, and thus that the Court will likely be able to certify the Settlement Classes as proposed in the Settlement Agreement.

3. Appointing Sheena Bibbs, Tina Bishop, Beverly Gordon, Julian Graves, Martha Lacy, Taylor Lorimer, Soyna Mull, Vinnie Smith, Sandra Walker, and Jerome Whitney as the Settlement Class Representatives.

4. Appointing J. Gerard Stranch, IV, Sarah Sterling Aldridge, and Charles J. LaDuca as Settlement Class Counsel pursuant to Fed. R. Civ. P. 23(c)(1)(B) and 23(g).

5. Approving the Notice Plan and authorizing dissemination of notice to the Settlement Class; and

6. Appointing Angeion Group LLC as Settlement Claims Administrator.

WHEREFORE, for the reasons set forth in the accompanying memorandum of law and exhibits, Plaintiffs respectfully request that the Court grant this motion and enter the Preliminary Approval Order filed herewith. Defendants do not oppose this motion.

Dated: June 19, 2023.

/s/ J. Gerard Stranch, IV

J. Gerard Stranch, IV  
STRANCH, JENNINGS & GARVEY, PLLC  
The Freedom Center  
223 Rosa L. Parks Ave., Suite 200  
Nashville, TN 27203  
Tel: (615) 254-8801  
[gstranch@stranchlaw.com](mailto:gstranch@stranchlaw.com)

Sarah Sterling Aldridge  
BARRETT LAW GROUP, P.A.  
404 Court Square North  
Lexington, MS 39095  
Tel: (662) 834-2488

[saldridge@barrettlawgroup.com](mailto:saldridge@barrettlawgroup.com)

*Interim Co-Lead Counsel*

Charles J. LaDuca  
Cuneo Gilbert & LaDuca, LLP  
4725 Wisconsin Ave., NW, Ste. 200  
Washington, DC 20016  
Tel: 202-789-3960  
[charles@cuneolaw.com](mailto:charles@cuneolaw.com)

*Attorney on the Plaintiffs' Steering Committee*

**CERTIFICATE OF SERVICE**

I, J. Gerard Stranch, IV, hereby certify that the foregoing Plaintiffs' Unopposed Motion for Preliminary Approval of Consolidated Class Action Settlement was served on June 19, 2023, via e-mail and the Court's ECF system to the following:

Christopher Chorba  
GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: 213-229-7000  
Facsimile: 213-229-7520  
cchorba@gibsondunn.com

Jason R. Meltzer  
Jesenska Mrdjenovic  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
Telephone: 202-955-8500  
Facsimile: 202-467-0539  
jmeltzer@gibsondunn.com  
jmrdenovic@gibsondunn.com

*Attorneys for Defendants*

/s/ J. Gerard Stranch, IV